IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

HOSPITAL SYSTEMS CORPORATION, § 8 8 8 8 PLAINTIFF, V. CIVIL ACTION NO. 2:07-CV-389-TJW § GENERAL ELECTRIC COMPANY D/B/A § GE HEALTHCARE; FUJIFILM MEDICAL **JURY TRIAL DEMANDED** SYSTEMS U.S.A., INC.; SECTRA NORTH AMERICA, INC.; EMAGEON INC.; AGFA HEALTHCARE CORPORATION; and NOVARAD CORPORATION, DEFENDANTS.

JOINT MOTION FOR ENTRY OF AMENDED CONSENT PROTECTIVE ORDER

Plaintiff, Hospital Systems Corporation, and Defendants, General Electric Company d/b/a GE Healthcare, FUJIFILM Medical Systems U.S.A., Inc., Sectra North America, Inc., Emageon Inc., Agfa HealthCare Corporation and Novarad Corporation, file this Joint Motion for Entry of Amended Consent Protective Order and request that this Honorable Court enter the Amended Consent Protective attached hereto.

The Amended Consent Protective Order is the same as the Consent Protective Order entered by this Court on October 2, 2008 except that paragraph 3(b) is amended to clarify that newly added Defendants Sectra North America, Inc., Emageon Inc., Agfa HealthCare Corporation and Novarad Corporation fall within the definition of a "receiving party" for certain previously produced materials and paragraph 4(a) is

amended to clarify that outside counsel for the newly added Defendants fall within the definition of "outside counsel."

Dated: May 26, 2009 DINOVO PRICE ELLWANGER & HARDY LLP

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service, are being served this 26th day of May 2009, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

By: /s/ Andrew W. Spangler
Andrew W. Spangler